

Law Offices of

OLSON

HAGEL &

FISHBURN

LLP

August 5, 2013

VIA FACSIMILE AND REGULAR MAIL

Federal Election Commission
Attn: Ben Holly
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

RECEIVED

2013 AUG -6 AM 10:12

FEC MAIL CENTER

RE: California Nurses Association Political Action Committee
Identification Number: C90013616
Reference: Year End Report (FEC Form 5 10/1/2012 – 12/31/2012)

Dear Mr. Holly:

On behalf of our client, California Nurses Association Political Action Committee, we write to respond to the letter dated July 29, 2013 (copy enclosed) which raises two questions regarding our client's Report. Our firm prepares and files reports on behalf of our client.

The first question relates to an independent expenditure made to The Campaign Workshop for a mailer on October 27, 2012 in the amount of \$4,502.10. We reviewed our file, and it is clear that the 24-hour Report was prepared and signed by our client, and then it was faxed by our office. However, according to the fax receipt, the fax to the FEC did not go through, and this was simply not noticed at the time. Of course, we take full responsibility for this error.

Your letter also requests additional information regarding any contributors who made donations in excess of \$200 to fund the independent expenditures disclosed on our client's report. Federal regulations require a person filing FEC Form 5 to identify each person who made a contribution in excess of \$200 to the person filing the report if the contribution "was made for the purpose of furthering the reported independent expenditure." (11 CFR 109.10(e)(1)(vi).) Our client did not receive any contributions in excess of \$200 for the purpose of making the reported independent expenditures. Accordingly, the year end Report is complete and accurate, and no amendment is required.

Very truly yours,

OLSON HAGEL & FISHBURN LLP


DIANE M. FISHBURN

Lance H. Olson

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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July 29, 2013

CALIFORNIA NURSES ASSOCIATION
POLITICAL ACTION COMMITTEE (CNA
PAC)

2000 FRANKLIN STREET
OAKLAND, CA 94612

Response Due Date
09/03/2013

IDENTIFICATION NUMBER: C90013616

REFERENCE: YEAR-END REPORT (10/01/2012 - 12/31/2012)

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 2 item(s):

1. Your quarterly report discloses an independent expenditure to The Campaign Workshop for Mailer on 10/27/12. This expenditure does not appear on 24/48-hour reports.

Please be advised that Commission regulations require that you file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e))

In addition, you are required to file 24-hour reports once your independent expenditures aggregate \$1,000 or more after the 20th day but more than 24 hours before 12:01 a.m. of the day of the election. The report must be received at the Commission by 11:59 p.m. Eastern Standard/Daylight Time of the day

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CALIFORNIA NURSES ASSOCIATION POLITICAL ACTION COMMITTEE (CNA PAC)

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following the date on which the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$1,000 or more, you must file another 24-hour report disclosing these independent expenditures. (11 CFR § 109.10(d) and (e))

Please provide clarification regarding whether a 24/48-hour report was required but not filed. If the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

2. Line 7 of your FEC Form 5 filing discloses disbursements made for independent expenditure(s). However, no contributions are disclosed on Line 6, "Total Contributions." Each contributor who made a donation in excess of \$200 to further the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information. Please amend your report to provide the missing information. (11 CFR §§ 109.10(e)(1)(vi) and 114.10(f))

Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered. Failure to comply with the provisions of the Act may result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,



Ben Holly
Senior Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
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<input type="checkbox"/> No Postmark	
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<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>UPS</i>	Shipping Date <i>8/5/13</i>	
Next Business Day Delivery		<input checked="" type="checkbox"/>

<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
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<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
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PREPARER

(7/2013)

8/6/13

DATE PREPARED

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